

Ohio EPA

Re: HMM
Ford Motor Company
Ohio Truck Plant
81-FW-0438

US EPA RECORDS CENTER REGION 5



432160

Ohio Truck Plant
Ford Motor Company
650 Miller Road
Avon Lake, Ohio 44012

February 24, 1982

Attn: Mr. Jim Davis

Dear Mr. Davis:

On February 10, 1982, this writer met with you and conducted an inspection of your facility with regard to Hazardous Materials Management. A copy of the inspection report is enclosed for your information.

A hazardous waste treatment/storage/disposal permit application had been submitted for this facility, but later withdrawn. During the inspection it was determined that the Ohio Truck Plant does, however, meet the criteria of a hazardous waste generator.

The inspection report indicates that this facility is in general compliance with Ohio Hazardous Waste OAC 3745-50 through 3745-58, with the following exception:

<u>Regulation</u>	<u>Description of Violation</u>
3745-55-52	Addresses of emergency coordinators not included in Contingency Plan.
	Location and capabilities of emergency equipment not included in the Contingency Plan.

Please amend the Contingency Plan accordingly, and submit a copy of these revisions to this office within thirty days of receipt of this letter.

A copy of the inspection report will be forwarded to U.S. EPA - Region V. Please feel free to contact me or Kathy Homer of the U.S. EPA at (312) 866-3718 if you have any questions.

Sincerely,

Helen Takacs

Helen Takacs
Environmental Scientist
Division of Hazardous Materials Management

cc: Paula Cotter, DHMM, C.O.
Kathy Homer, SIP, U.S. EPA - Region V

HT:km

Enclosure

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. CAH020 011607Facility: Ford - Ohio Truck Plant Address: 650 Miller Road City: Ann ArborState: Ohio Zip Code: 44012 County: Lorain Telephone: 216/282-6121Facility Operator: Ford Motor Company Title: _____ Telephone: _____

Facility Owner: _____ Address: _____

City: _____ State: _____ Zip Code: _____ Telephone: _____

Type of Ownership: ☒ ^{Public} Private ☐ Government State HWFAB No. 81-HW-0438Date of Inspection: 2/10/82 Time of Inspection: (Start) 10:00 (Finish) 11:45Advance Notification? ☐ No ☒ Yes: _____Weather Conditions: Sunny, 20°F

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>Jim Davis</u>	<u>Designated Environmental Coordinator</u>	<u>216/282-6121 x237</u>
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	<u>Heber Tokars</u>	<u>Environmental Scientist</u>	<u>216/425-9171</u>
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ☒ Generation B. ☐ Storage C. ☐ Treatment
D. ☐ Transportation E. ☐ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: F001, F003, F005, F017, F019

b) Non-Listed Wastes: D001 I ☒ D002 C D003 R D000 T

3. Has this facility submitted a Part A Permit Application? ☒ Yes ☐ No See Notes #1

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

☐ Yes, See Remark # ☒ No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ ✓ No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) ✓ No

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

7. A brief description of site activity:

Assemble and paint Ecovoline van bodies

REMARKS, PART 1. (GENERAL INFORMATION)

1. A Part A Application was submitted for a Treatment/Storage/Disposal ~~2~~ permit. Certain wastes were tested and determined to be non-hazardous¹⁵⁰. The managing of the hazardous wastes were changed so that the entity could qualify as a generator.

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>caustic liquid used in WWTP, effluent is discharged to sanitary sewer</i>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	✓	—	—	—
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	✓	—	—	—
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	✓	—	—	<i>transporter provides placards</i>
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	—	—	✓	<i>inspection performed prior to deadline</i>
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	—	—	✓	inspection
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	—	—	✓	—
8. If the generator elects to store hazardous waste on-site in <u>containers or tanks for 90 days</u> or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:				
a) <u>Containers:</u> the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The date that accumulation began is clearly marked on each container.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>1</u>
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u> </u>
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u> </u>
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>2</u>
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u> </u>
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u> </u>
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u> </u>
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u> </u>
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.			<input checked="" type="checkbox"/>	

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

1. No hazardous waste drums were on the site at the time of the inspection. However, the labels that are affixed to the drum and the procedure for marking the accumulation date was reviewed.
2. There are two 10,000 gallon underground tanks for spent solvent storage. One of the tanks has an automatic feed and is equipped with a waste-feed cut-off. The other tank is manually fed.

Subpart C: Preparedness and Prevention

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| 1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32). | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| a) Internal alarm system | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Access to telephone, radio or other device for summoning emergency assistance. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Portable fire control equipment. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	<u> </u>	<u> </u>	<u>✓</u>	<u> </u>
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).	<u> </u>	<u> </u>	<u>✓</u>	<u> </u>

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components: <i>265.52</i>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
a) Actions to be taken by personnel in the event of an emergency incident.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
b) Arrangements or agreements with local or state emergency authorities.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	<u> </u>	<u>✓</u>	<u> </u>	<u>2</u>
d) A list of all emergency equipment including location, physical description and outline of capabilities.	<u> </u>	<u>✓</u>	<u> </u>	<u>3</u>
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	<u> </u>	<u> </u>	<u>✓</u>	<u> </u>
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|-------------------------------------|--------------------------|--------------------------|-----------------|
| 3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | _____ |
| 4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | _____ |
| 5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | _____ |

REMARKS, SUBPARTS C and D

1. There have been 3 small-scale spills at the plant. The Coast Guard and Ohio EPA were notified.
2. Names and telephone numbers are provided, but not addresses.
3. A list of the emergency equipment is provided, but not the location of the equipment or the capabilities of the equipment.